

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

JOD SELOU,

Plaintiff,

v.

INTEGRITY SOLUTION SERVICES
INC., INTEGRITY ACQUISITION, LLC,
CENTRAL CREDIT SERVICES, INC.,
and RADIUS GLOBAL SOLUTIONS,
LLC

Defendants.

Rex C. Anderson (P47068)
Rex Anderson PC
Attorney for Plaintiff
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Case No. 4:15-CV-10927-LVP-MJH
Hon. Linda V. Parker
Magistrate Michael J. Hluchaniuk

Deborah Lujan
Attorney for Defendant
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Sessions, Fishman, Nathan & Israel LLC
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PLAINTIFF, JOD SELOU'S AMENDED PRELIMINARY WITNESS LIST

Plaintiff, Jod Selou, through her attorney, Rex Anderson, P.C., identifies the following witnesses that may be called during the trial of this matter:

1. Plaintiff, Jod Selou, who may be reached through the undersigned counsel.
2. Jeff Bahri, who may be reached through the undersigned counsel
3. Yubel Selou who may be reached through the undersigned counsel
4. Heather Howie who's address is unknown at this time.
5. Designated representative and / or 30(b)(6) witness for Defendant, Central Credit Services Inc., whose identity will be revealed through discovery.

6. Designated representative and / or 30(b)(6) witness for Defendant, Integrity Solution Services Inc., whose identity will be revealed through discovery.
7. Designated representative and / or 30(b)(6) witness for Defendant, Integrity Acquisition LLC, whose identity will be revealed through discovery.
8. Designated representative and / or 30(b)(6) witness for Defendant, Radius Global Solutions LLC., whose identity will be revealed through discovery.
9. Defendant collectors whose true identity will be revealed through discovery.
10. Jeremy Mapes, Expert Witness will testify to Defendant's use of Automated Telephone Dialing System.
11. Current or former employees of Central Credit Services Inc., that were involved in collection attempts on Plaintiff's account.
12. Any and all witnesses whose identities become known through further discovery.
13. Records custodians of any and all phone companies used by either party.
14. Any and all records custodians of any and all automated dialer vendors, retained by Defendant to place calls to Plaintiff's cell phone.
15. Any and all record custodians of any and all skip-tracing vendors and / or credit bureaus.
16. All individuals listed on Defendants' Witness Lists or amended Witness List.
17. Rebuttal witnesses, if necessary
18. Plaintiff reserves the right to amend and supplement her witness list.

Dated: March 22, 2016

Respectfully submitted,
REX ANDERSON PC

/s/ Rex C. Anderson
Rex C. Anderson, Esq. (P47068)
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CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2016 I filed the **PLAINTIFF'S AMENDED PRELIMINARY WITNESS LIST** with the Clerk of the Court using the ECF filing systems which will send notification on the following parties of interest:

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Dated: March 22, 2016

/s/ Beth Hudson

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